IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ACCU-SPEC ELECTRONIC SERVICES, INC., Plaintiff	)	
v.	)	C.A. NO.: 03-394 E
	)	Judge: McLaughlin
CENTRAL TRANSPORT INTERNATIONAL, INC. and LOGISTICS PLUS, INC., Defendants	)	

PLAINTIFF'S REQUESTS FOR ADMISSIONS TO DEFENDANT (FIRST SET)

Plaintiff Accu-Spec Electronic Services, Inc. ("Accu-Spec") by and through it attorneys, MacDonald Illig Jones & Britton LLP, serves these Requests for Admissions on Defendants Central Transport International, Inc. ("Central Transport") and Logistics Plus, Inc. (Logistics Plus"), pursuant to F.R.C.P. 36 requesting that the defendants serve full and complete responses to the following Requests for Admissions within 30 days of the service thereof to 100 State Street, Suite 700, Erie, Pennsylvania 16507.

1. Attached to these Requests for Admissions are invoices from Dage Industries, Inc. to Accu-Spec Electronic Services, Inc. (Documents A116-A122 and A127-A129).

ADMITTED ____________ DENIED ____________

2. The invoices described in Requests for Admission 1 are authentic.

ADMITTED ____________ DENIED ____________

3. The charges represented by these invoices were reasonable.

ADMITTED ____________ DENIED ____________

4. The repair work described in the invoices was reasonably required by the events alleged in the Complaint filed in the above-caption matter.

ADMITTED ____________ DENIED ____________

5. Accu-Spec has paid the amounts indicated on the attached invoices.

ADMITTED ____________ DENIED ____________

Respectfully submitted,

Thomas A. Pendleton

James E. Spoden
Thomas A. Pendleton
MacDONALD, ILLIG, JONES & BRITTON LLP
100 State Street, Suite 700
Erie, Pennsylvania 16507-1459
(814) 870-7710

Attorneys for Plaintiff
Accu-Spec Electronic Services, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served upon all other parties appearing of record by First-Class United States Mail and fax sent on July 26, 2004.

Thomas A. Pendleton

835567

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ACCU-SPEC ELECTRONIC SERVICES, INC., Plaintiff	)	
v.	)	C.A. NO.: 03-394 E
CENTRAL TRANSPORT INTERNATIONAL, INC. and LOGISTICS PLUS, INC., Defendants	)	Judge: McLaughlin

VERIFICATION

I, ______________, am employed by defendants ______________ in the position of ______________ and I am authorized to execute this Verification. The Responses to the foregoing Requests for Admissions are true and correct to the best of my knowledge, information and belief.

____

Date: July _____, 2004

Dage Precision Industries Ltd
Rabans Lane
Aylesbury
Bucks
HP19 8RG

Tel: 01296 317800
Fax: 01296 435408

pjw@dage-group.com
www.dage-group.com

Jim Mullen
Accuspec Electronic Services
8835 Walmer Drive
Mckean,
PA, 16426

Peter Dunns Expenses From Trip To Asses Damage assessment on a DAGE-XRS-XL6500-001 - Serial No. DMXL0126 X-Ray machine supplied to Accupspec Electronic, Erie, PA.

Hello Jim,

Please find attached copies of the recipts for expenses that Peter Dunn incurred during his assessment trip to Accuspec on 14th – 16th April. If you need any clarification on any of the expenses then please let me know

Best regards

Paul Walter
Managing Director
DPI Ltd.

Expenses attached :

Flights – receipt 1 UK £993.40 → U.S. $ 1,628.48
Car Hire – receipt 2 – UK £112.92 185.11
Misc. subsistence – receipt 3 – US $24.65 24.65
Hotel for two nights – receipt 4 – US $312.58 312.58

US, $2,150.82

A116

505822

PORTMAN

PORTMAN TRAVEL LTD

105 ST PETERS STREET
ST ALBANS AL1 3HH GB
Tel:01727-862822
Fax:01727-851386

DAGE LIMITED
RABANS LANE
AYLESBURY
HP19 8RG
UNITED KINGDOM

Traveller(s)
DUNN/PETERMR

INVOICE

Ordered By: ELAINE
JOB NUMBER : 1600

Branch No/Invoice No: 009/62875
Date of Invoice: 24/04/2003
Consultant/File Ref: Y07QQ/2599687
Date of Travel: 14/04/2003
Accountnumber: 1244

Supplier	Qty	Service	Amount	Total	VAT
40004	2	AVIS RENT A CAR LTD	57.20	57.20	.00%
		COMP 2/4DR AUTO			
		PITTSBURGH			
		14 Apr 2 Days			
		MISC CAR EXTRAS	40.72	40.72	
		EXTRAS : INSURANCE COVER / REFUELLING CHARGE / : LOCAL TAXES			
		SUPPLIER REFERENCE : U728887666T			
1000000	1	BOOKING FEE	15.00	15.00	.00%

Summary===

Total cost	GBP	112.92
Total VAT	GBP	.00
Total Due:	GBP	112.92

US $ 185.109

28 APR 2003

RADIUS the global travel company

VAT Registered No. 680 4034 53

'Note Standard Terms & Conditions have been updated - see overleaf'

GBTA 3312

A117

PORTMAN

504.884

PORTMAN TRAVEL LTD

105 ST PETERS STREET
ST ALBANS AL1 3HH GB
Tel:01727-862822
Fax:01727-851386

DAGE LIMITED
RABANS LANE
AYLESBURY
HP19 8RG
UNITED KINGDOM

Traveller(s)
DUNN/PETERMR

INVOICE

Ordered By: ELAINE
JOB NUMBER : 1600

Branch No/Invoice No: 009/62467
Date of Invoice: 11/04/2003
Consultant/File Ref: Y07QQ/2599687
Date of Travel: 14/04/2003
Accountnumber: 1244

Supplier	Qty	Service	Amount	Total	VA
2000	1	Flight inclusive of taxes and fees 125 000009382639815 LONDON HEATHROW/BOSTON/ PITTSBURGH/BOSTON/ LONDON HEATHROW	993.40	993.40	.0

1

010

15 APR 2003

OK 22/4/03

Summary===
Total cost GBP 993.40
Total VAT GBP .00

Total Due: GBP 993.40

US $ 1628.48

RADIUS the global travel company

VAT Registered No. 680 4034 53

'Note Standard Terms & Conditions have been updated - see overleaf'

GBTA

ATOL 3312

A118

(1)

WHSmith Gift Shop #153

4618567 DASANI WATER 20	1.49
SUBTOTAL	1.49
TOTAL	1.49
CASH	(10.00)
CHANGE	8.51-

Cshr 21: Miranda L. 219 # 191
Register: REG1 Apr 14 2003 2:16 PM

Thank You ... How are we doing?
Customer Service 888-881-7901

(4)

Hudson News
Logan ADE
E.Boston MA 02128

Store:069

WATER	1.35	D1
Sale Total	1.35	
Cash	1.50	
Change	.15	

** Thank You **

TRN# 090594 04/16/03 6:29 PM
Terminal# 09, Drawer# 01, Cashier# 00830

(3) Total = $24.65

(2)

Scott's Apple Inc.
Applebee's
7790 Peach St
Erie, PA 16509
814-866-8210

TB#38 Michelle H
Date: 04-15-03 Time: 3:59p Guests: 1

2	Bud Brewtus	7.00
1	Pepper Steak	10.99
1	Apple Crisp	3.59

******* Guest # 1 Sub Total: 21.81

Check Total: 21.58
Primary : 0.23
Total Due: 21.81

Duplicate # 1
Applebee's employees support our troops overseas!!!

(3)

COURTYARD
Marriott

GUEST CHARGES SUMMARY

Toll Free Reservations (800) 321-2211

THANK YOU FOR SELECTING COURTYARD BY MARRIOTT FOR YOUR TRIP. WE TRUST THAT YOUR EXPERIENCE WITH US HAS INCLUDED WARM AND GRACIOUS SERVICE, AND THE TYPE OF ACCOMMODATIONS EXPECTED.

WE LOOK FORWARD TO SERVING YOU AGAIN ON FUTURE TRIPS. FOR ADDITIONAL RESERVATIONS CALL OUR TOLL-FREE RESERVATION NUMBER, (800) 321-2211.

ERIE Courtyard Staff

ERNIE CARLSON
8835 WALMER DRIVE
MCKEAN PA 16426

ACCU SPEC ELECTRONICS

ROOM 406 BARD
ROOM TYPE QNQN
NO. OF GUESTS 1
RATE 89.00
CLERK JLR

ARRIVE 14Apr03 TIME 07:31p DEPART 16Apr03 TIME 08:22a FOLIO # 6Q-97317

DATE	REFERENCE NUMBER	DESCRIPTION	CHARGES	CREDITS
14Apr03	CT406	CITY TAX	4.45	
14Apr03	LD365A	LD814-01144129(1)	14.20	
14Apr03	RP406	ROOM CHARGE	89.00	
14Apr03	RT406	ROOM TAX	5.34	
14Apr03	TE367A	LCL PH814-898-1857	.50	
14Apr03	TE369A	LCL PH814-323-5480	.50	
15Apr03	CT406	CITY TAX	4.45	
15Apr03	FD717	RESTAURANT ROOM CH	7.00	
15Apr03	LD462A	LD011441296317(1)	23.00	
15Apr03	LD463A	LD011441296317(1)	18.60	
15Apr03	LD467A	LD011441296317(1)	31.80	
15Apr03	LD519A	LD011441296317(2)	27.40	
15Apr03	LD559A	LD011441296317(2)	49.40	
15Apr03	LD624A	LD011441296317(2)	27.40	
15Apr03	LD669A	LD011441296317(2)	9.80	
15Apr03	LD806A	LD011441296317(2)	14.20	
15Apr03	RP406	ROOM CHARGE	89.00	
15Apr03	RT406	ROOM TAX	5.34	
16Apr03	FD754	RESTAURANT ROOM CH	7.00	
16Apr03	LD002A	LD011441296317(2)	14.20	
16Apr03	LD004A	LD011441296317(2)	9.80	
16Apr03	LD013A	LD011441296317(2)	67.00	
16Apr03	LD956A	LD011441296317(2)	14.20	
16Apr03	LD964A	LD011441296317(2)	9.80	
16Apr03	LD971A	LD011441296317(2)	9.80	
16Apr03	LD978A	LD011441296317(2)	9.80	
16Apr03	LD996A	LD011441296317(2)	14.20	

To enroll in Marriott Rewards, call • 1-800-249-0800

SIGNATURE________________________ A120

FORM 6-2784 REV. 1/02

(4)

COURTYARD
Marriott

GUEST CHARGES SUMMARY

Toll Free Reservations (800) 321-2211

THANK YOU FOR SELECTING COURTYARD BY MARRIOTT FOR YOUR TRIP. WE TRUST THAT YOUR EXPERIENCE WITH US HAS INCLUDED WARM AND GRACIOUS SERVICE, AND THE TYPE OF ACCOMMODATIONS EXPECTED.

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ERIE Courtyard Staff

ERNIE CARLSON
8835 WALMER DRIVE
MCKEAN PA 16426

ACCU SPEC ELECTRONICS

ROOM	406	BARD
ROOM TYPE	QNQN	
NO. OF GUESTS	1	
RATE	89.00	
CLERK	JLR	

ARRIVE 14Apr03 TIME 07:31p DEPART 16Apr03 TIME 08:22a FOLIO # 6Q-97317

DATE	REFERENCE NUMBER	DESCRIPTION	CHARGES	CREDITS
16Apr03	MC08:22AM	MASTER CARD		577.18-

```
*********************          ************************************
* THIS CARD WAS     *          *  CARD #: MCXXXXXXXXXXXX0865      *
* ELECTRONICALLY    *          *  Amount:     577.18   Auth: 016156 *
* SWIPED ON 14Apr03 *          *        ** Signature on File  **  *
*********************          ************************************
```

** BALANCE ** .00

Total $ 577.18

- Daye related Calls + emails $ 264.80

~~Total $ 312.58~~

To enroll in Marriott Rewards, call • 1-800-249-0800

SIGNATURE__________ A121

FORM 6-2784 REV. 1/02

dage

Dage Precision Industries Ltd
Rabans Lane
Aylesbury
Bucks
HP19 8RG

Tel: 01296 317800
Fax: 01296 435408

dpi-sales@dage-group.com
www.dage-group.com

16th April 2003

Jim Mullen
Accuspec Electronic Services
8835 Walmer Drive
Mckean,
PA, 16426

Repair Estimate for Dage XRS-XL6500-001 Serial No. DMXL0126

Reference	Action	Contract $	Labour $	Materials $
1.	Repackage ready for shipment to UK	1,092		
2.	Freight to UK (Air)	3,262		
3.	Remove all sub – assemblies from damaged cabinet		1,100	
4.	Dismantle Inner from outer cabinet.		450	
5.	Removal and disposal of Lead from inner cabinet	250	600	
6.	Disposal of damaged inner, outer cabinets and Facia	250		
7.	Replacement inner & outer cabinets and Front facia			17,160
8.	Replacement Lead			2,184
9.	Reassemble leaded cabinet, and refit all wiring looms		1,270	
10.	Retest and refit Image intensifier frame assembly		275	
11.	Retest and refit X – Y manipulator assembly		275	
12.	Retest and refit Servo drawer assembly		320	
13.	Retest and refit PC and associated wiring		280	
14.	Refit X – Ray tube, Vacuum system, & Tube controller		420	
15.	X – Ray emissions & full functional testing		650	
16.	Miscellaneous consumables and replacement items			1,000
17.	Packaging ready for shipment to USA	1,092		
18.	Freight to USA (Air)	3,262		
	Sub Totals..	9,208	5,640	20,344

Total estimated cost: $35,192

Estimated time to repair: 3 weeks excluding freight time

N.B The costs of our Engineer Mr. Peter Dunn and associated expenses will be charged over and above the cost estimate and will be borne by Accupspec Electronics Erie PA

Signed:............P.C. Dunn........ Date:...16/4/03......
Peter Dunn, Dage Precision Industries Ltd

A122

dage

Dage Precision Industries Ltd
Rabans Lane
Aylesbury
Bucks
HP19 8RG

Tel: 01296 317800
Fax: 01296 435408

dpi-sales@dage-group.com
www.dage-group.com

12th August 2003

Jim Mullen
Accuspec Electronic Services
8835 Walmer Drive
Mckean,
PA, 16426

Repair Charges for Dage XRS-XL6500-001 Serial No. DMXL0126

Reference Action	Contract $	Labour $	Materials $
1. Repackage ready for shipment to UK ***Paid by Accuspec***	0		
2. Freight to UK (Sea) ***Paid by Accuspec***	0		
3. Remove all sub – assemblies from damaged cabinet		1,100	
4. Dismantle Inner from outer cabinet.		450	
5. Removal and disposal of Lead from inner cabinet	250	600	
6. Disposal of damaged inner, outer cabinets and facia	250		
7. Replacement inner & outer cabinets and Front facia			17,160
8. Replacement Lead			2,184
9. Reassemble leaded cabinet, and refit all wiring looms		1,270	
10. Retest and refit Image intensifier frame assembly		275	
11. Retest and refit X – Y manipulator assembly		275	
12. Retest and refit Servo drawer assembly		320	
13. Retest and refit PC and associated wiring		280	
14. Repalace Bandit frame grabber card & test			1073
15. Replace Tube control electronics rack assembly & test			7663
16. Refit X – Ray tube, Vacuum system, & Tube controller		420	
17. X – Ray emissions & full functional testing		650	
18. Miscellaneous consumables and replacement items			1,000
19. Packaging ready for shipment to USA	1,092		
20. Freight to USA (Air) ***Paid by Accuspec***			
Sub Totals...	1,592	5,640	29,080

Total repair costs: $36,312

N.B The costs of our Engineer Mr. Peter Dunn and associated expenses will be charged over and above the cost estimate and will be borne by Accupspec Electronics Erie PA

PO# 86304

A127

Dage Precision Industries Ltd
Rabans Lane
Aylesbury
Bucks
HP19 8RG

Tel: 01296 317800
Fax: 01296 435408

dpi-sales@dage-group.com
www.dage-group.com

Jim Mullen
Accuspec Electronic Services
8835 Walmer Drive
Mckean,
PA, 16426

Damage assessment on a DAGE-XRS-XL6500-001 - Serial No. DMXL0126 X-Ray machine supplied to Accupspec Electronic, Erie, PA.

The outside of the cabinet was inspected and a straight edge used to gauge the extent of the damage. Distortion to varying degrees has occurred along the full length of the front fascia shelf. In particular the front lower right hand corner which has been pushed back into the outer cabinet. The amount of deformation to the outer cabinet would indicate that damage has also occurred to the lead on the inner cabinet, this would compromise the effectiveness of the x-ray shielding and make the machine dangerous to use. The front fascia is severely bent and buckled making it beyond economical repair.

The inside of the inner cabinet was inspected using a flash light with particular attention given to the welded seams, though there is a small amount of flaking paint there are no obvious signs of physical damage to the inside of the cabinet. There are also no visual signs of damage to any of the major sub-assemblies within the cabinet. The transit brackets were checked for signs of stress, none could be seen.

The rear doors are correctly aligned and the hinges show no evidence of movement. The rear door securing bolt alignment is correct. The doors were easily opened and closed securely.

The front loading door has clearance all-round and has not come into contact with the front fascia, clearance at the bottom of the door was less than that at the top.

The Gulmay power supply has not moved and shows no sign of damage.

The servo drawer, PC, vacuum pump and associated parts in the electronics tunnel appeared to be in good order.

All boxed accessories were inspected at the customer premises. The aluminium cover was removed from intensifier head and there was no damage evident. All the other accessories were found to be in order.

Damage appears to be restricted to the front fascia, outer cabinet and the lead only. There may be however damage to electronic components that will not be seen until the machine is powered up and tested.

The packaging displayed extensive damage to the front and base. Some of the machine castors had penetrated through the pallet and the machine was resting on bottom edge of the outer cabinet.

The best course of action would be to return the machine complete to the UK for repair and test.

Report compiled by P. C. Dunn Engineer for Dage Precision Industries Ltd. 15 April 2003

P.C. Dunn............................
Signed: Peter Dunn

16/4/03.........
Date

A128

Dage Precision Industries Ltd
Rabans Lane
Aylesbury
Bucks
HP19 8RG

Tel: 01296 317800
Fax: 01296 435408

dpi-sales@dage-group.com
www.dage-group.com

Jim Mullen
Accuspec Electronic Services
8835 Walmer Drive
Mckean,
PA, 16426

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Report compiled by P. C. Dunn Engineer for Dage Precision Industries Ltd. 15 April 2003

....
Signed: Peter Dunn

....
Date

A129